

**SOUTH DAKOTA DEPARTMENT OF EDUCATION AND CULTURAL AFFAIRS  
OFFICE OF SPECIAL EDUCATION**

**Black Hills Special Services Cooperative  
Continuous Improvement Monitoring Process 2001-2002**

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**Dates of On Site Visit:** January 22-24, 2002

**Date of Report:** February 5, 2002

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This report contains the results of the steering committee's self-assessment and the validation of the self-assessment by the Office of Special Education. The report addresses six principles – General Supervision, Free Appropriate Public Education, Appropriate Evaluation, Procedural Safeguards, Individualized Education Program and Least Restrictive Environment. Each principle is rated based on the following scale:

<b>Promising Practice</b>	The district/agency exceeds this requirement through the implementation of innovative, high-quality programming and instructional practices.
<b>Maintenance</b>	The district/agency consistently meets this requirement.
<b>Needs Improvement</b>	The district/agency has met this requirement but has identified areas of weakness that left unaddressed may result in non-compliance.
<b>Out of Compliance</b>	The district/agency consistently does not meet this requirement.
<b>Not applicable</b>	In a small number of cases, the standard may not be applicable to the district/agency. If an item is not applicable, the steering committee should briefly explain why the item is NA. Example – no private schools within the district boundaries.

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<b>Principle 1 – General Supervision</b>
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General supervision means the school districts or agencies administrative responsibilities to ensure federal and state regulations are implemented and a free appropriate public education is provided for each eligible child with a disability. The specific areas addressed in principle one are child find, referral procedures, children voluntarily enrolled by parents in private schools, students placed by the school district in private schools or facilities, improving results through performance goals and indicators (assessment, drop out, graduation), professional development, and suspension and expulsion rates.

**Steering Committee Conclusions**

Data sources used for self-assessment –

- ? Agency personnel development system
- ? Agency procedures on suspension/expulsion

**Promising Practices**

Personnel and professional development was reported to be at a promising practice, due to the intensive orientation and training process, which is competency based, used by the cooperative.

**Areas of maintenance**

The committee indicated in their self-assessment that the cooperative is at a maintenance level for addressing improved results through performance goals and indicators. The self-assessment noted the use of the STAARs to assess students towards achievement of state goals and indicators. No concerns were noted with the process the cooperative follows in receiving students placed at their agency by school districts for the purposes of receiving special education services.

**Not Applicable**

The steering committee concluded that the areas of child find, referral, students placed in private schools and suspension/expulsion rates were not applicable to their program. The cooperative receives students already identified from school districts across the state, and thus, do not have a process for child find and referral. Additionally, the cooperative does not suspend or expel students, and therefore has no information or procedures to review.

**Validation Results****Promising Practices**

The cooperative provided documentation regarding the professional development system employed. This system is competency based, providing a comprehensive system for ensuring all staff have a consistent knowledge base. Additionally, the agency has a component of staff development that provides for goal setting on an individual staff member basis. Staff reported being able to receive financial support and other methods of support such as work schedule adjustments, to attend specific training and in some cases, college coursework. Based upon this information, the review team validated this system as a promising practice.

**Maintenance**

Via the file review completed on site, the review team determined that in the area of general supervision, the agency consistently meets the requirements applicable under this section.

<b>Principle 2 – Free Appropriate Public Education</b>
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All eligible children with disabilities are entitled to a free appropriate public education in the least restrictive environment. The specific areas addressed in principle two, are the provision of FAPE to children residing in group homes, foster homes, or institutions, making FAPE available when a child reaches his/her 3<sup>rd</sup> birthday and providing FAPE to eligible children with disabilities who have been suspended or expelled from school for more than 10 cumulative days.

**Steering Committee Conclusions**

Data sources used-

- ? Parent surveys
- ? Staff satisfaction surveys

**Promising Practice**

The self-assessment noted overall the cooperative consistently ensure the provision of FAPE, rating it at a level of potential promising practice. The steering committee made note of the feedback from parents, students and staff collected through agency surveys of consumers and staff satisfaction. It was reported that this information is used to evaluate the program annually.

**Not Applicable**

The steering committee determined the procedures for suspension and expulsion of students with disabilities was not applicable to their program, as students are never suspended from the program.

**Validation Results****Maintenance**

Based upon file review and interview with cooperative staff, it was found that the agency consistently meets the requirements of this section.

<b>Principle 3 – Appropriate Evaluation</b>
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A comprehensive evaluation is conducted by a team of knowledgeable staff, which also includes parental input. A valid and reliable evaluation will result in effective individualized education programs for eligible students. The specific areas addressed in principle three are written notice and consent for evaluation, evaluation procedures and instruments, eligibility determination, reevaluation and continuing eligibility.

**Steering Committee Conclusions**

Data sources used:

- ? IEP file reviews
- ? Written notices for meetings
- ? Agency procedures for evaluation

**Areas of Maintenance**

The self-assessment summary concluded based on data reviewed that the agency's procedures for comprehensive evaluations, evaluation procedures and instruments, eligibility determination and reevaluation were implemented at a maintenance level. Evaluation procedures and eligibility determination were originally listed as a promising practice, but the steering committee leader noted they were more accurately listed as an area of maintenance.

**Areas in Need of Improvement**

The committee noted a need for improvement for ensuring written notice, which includes students aged 14 and above, for transition planning purposes at IEP team meetings.

**Validation Results****Areas out of compliance:**

24:05:25:04.02 Determination of needed evaluation data

24:05:25:04.03 Determination of eligibility

Through review of file documentation and in interview with staff, the review team found that parental input into the evaluation planning process was not documented. Staff make telephone contacts with parents, but do not have a process of recording their input. Of the seven files reviewed in-depth, none contained any documentation of parental input into the evaluation process. Through the same seven files, it was also determined that the agency does not maintain documentation which supports the provision of eligibility reports to parents. Finally, parents are to receive a copy of the eligibility determination for their child. The agency staff told the review team that they did not have a process for providing the eligibility determination to parents. No documentation to support identified disabilities was found in any of the seven files reviewed.

#### 24:05:25:06 Reevaluations

The process of reevaluating students was reviewed by interviewing cooperative staff and completing in-depth reviews of evaluation documentation. Evaluation information for five students showed components of the reevaluations were missing. Prior notices indicated a full slate of evaluations were going to be completed, however, the review team was not able to consistently locate all the planned evaluations. As an example, a student was to be evaluated in the area of speech, but the speech report did not provide any standardized testing in this area. Similar incidences were seen in student files, where achievement and/or adaptive behavior testing was listed on the prior notice, but not administered. As another example, a student was reported as having autism, however, his group of assessments consisted only of an adaptive behavior inventory, speech test, an occupational assessment, and a Syracuse curriculum assessment completed by the classroom teacher. The review team found that the evaluation team would elect not to perform particular assessments as they were not needed to verify continuing eligibility. The parents were not notified of this decision in writing, nor were they informed of their right to request the assessment be completed regardless of the evaluation team's decision.

#### 24:05:25:04 Evaluation procedures

The review team found functional assessments of students are completed, however, the information provided from the assessment focuses on vocational life skills, leisure and functional living, rather than focusing on the academic strengths of the student as it relates to their involvement and progress in the general curriculum. No functional information was gathered that directly addressed the student's academic needs as compared to the functional standards. In interview, staff was unaware of the requirement to perform assessment in the area of academics and utilize the functional information for program development. Despite the omission of functional assessment in the area of academics, the review team found academic goals were developed. In interview, staff related that IEP goals were not based upon present levels of functioning.

### **Principle 4 – Procedural Safeguards**

Parents of children with disabilities have certain rights available. The school makes parents aware of these rights and makes sure they are understood. The specific areas addressed in principle four are adult student/transfer of rights, content of rights, consent, written notice, confidentiality and access to records, independent educational evaluation (IEE), complaint procedures, and due process hearings.

#### **Steering Committee Conclusions**

Data sources used-

- ? Teacher file reviews
- ? Surveys
- ? Comprehensive plan
- ? Parental rights document
- ? Consent and prior notice forms
- ? FERPA disclosure statement
- ? Access logs

#### **Promising Practices**

The self-assessment summary concluded that the transfer of student rights and confidentiality/access to records were potential promising practices.

### **Areas of maintenance**

The self-assessment reflected the agencies procedural safeguards document and consent/written notice process is at a maintenance level, and presenting no concerns.

### **Areas possibly out of compliance**

Prior to the onsite review, the agency identified the appointment of surrogate parents as a potential area of noncompliance, based upon a pre-site conference call with the team leader.

### **Not Applicable**

The self-assessment summary reported the areas of independent educational evaluation, complaint and due process procedures as not applicable to their agency.

## **Validation Results**

### **Areas out of compliance**

24:05:30:04 Prior notice and parent consent

24:05:30:05 Content of notice

The review team looked at the files of five students who were reevaluated by cooperative staff.. In the course of reviewing the documentation, the review team determined that proper notice was not being given for the reevaluations, nor was parental consent obtained in writing. Staff stated that parental consent was obtained via telephone. After speaking with the parent over the telephone, a notice is sent out. A review of these notices indicates that the agency plans to hold an IEP meeting, but no written information is given regarding intent to reevaluate or the purpose for the reevaluations. A separate page is included and referenced on the written notice, which provides a list of assessments to be given, but the parent does not get any further information regarding the proposed evaluations. Also, the parent is not signing consent for the evaluations to be conducted. As a result, the team could not determine if the required 25-day timeframe for evaluations is being followed.

24:05:30:15 Surrogate parents

The review team reviewed files for three students who were identified as needing a surrogate parent. Two of the three students had social workers that signed for consent and/or placement. One student was placed with foster parents, and did not need a surrogate. In interview with the cooperative staff, they indicated social workers were regularly providing consent in matters of special education. The agency does not have a consistent set of procedures they follow to ensure students in need of a surrogate parent have one appointed for them.

## **Principle 5 – Individualized Education Program**

The Individualized Education Program (IEP) is a written document for a child with a disability that is developed, reviewed and revised by the IEP team, which includes the parent. The specific areas addressed in principle five are IEP team, IEP content, transition components for secondary IEPs, annual reviews, transition from early intervention program, and IEP related issues.

### **Steering Committee Conclusions**

Data sources used –

- ? Teacher file reviews
- ? Student progress data

? Personnel development information

### **Areas of maintenance**

The self-assessment document initially reflected the status of IEP development to be a promising practice. However, the steering committee chairperson indicated that IEP development is at a maintenance level, based upon the definitions provided by the state agency. The committee noted data collection on goals and objectives is measured to provide accountability for achievement and overall effectiveness of special education services.

## **Validation Results**

### **Promising practices**

The cooperative has begun using a computerized system that makes student progress data available online to parents. This system, Data Fusion, provides reports of daily data collection on student goals. The information is seen in the form of bar graphs, which are easily read and informative.

### **Areas that need improvement**

#### **24:05:27:13.02 Transition services**

Students who are aged fourteen or older must have a course of study addressed in their IEP. Upon reaching age sixteen, eligible students must have within their IEP a plan for transition services which is outcome based, providing movement from school to post school activities. A review of student IEPs containing transition plans were found to be generically addressed. As an example, all student transition plans which indicated a need for adult services stated that the student would “make a request to the state DD division to convert (student’s name) HCBS funding to an adult slot which will enable (student’s name) to continue receiving services”. Under post secondary education, plans stated “post secondary education is currently not a personal goal for (student name)”. Plans typically reflected that all other transition service areas should “see listed goals and objectives”. Some variances were seen in stated employment and independent living outcomes, however, most plans did not represent an actual set of activities, but rather served as just a paper product. During the onsite visit, the review team noted the agency provides constant exposure and development of employment and independent living skills, however, these are not reflected in the transition planning process. The team found examples of students learning important skills, such as self-catheterization, however, this was not reflected in the transition plan.

### **Areas out of compliance**

#### **24:05:27:01.03 Content of individualized education program**

Each student’s IEP must contain a statement of his or her present level of educational performance. This statement must include information regarding how the student’s disability affects their involvement and progress in the general curriculum (functional standards). Student IEPs did not consistently address in the present levels of performance the impact the disabling condition had upon making academic progress toward achieving the functional standards. Staff did not demonstrate an understanding of the relationship between the functional assessment of the student, and the functional standards. Goals developed for the student were not consistently linked to functional academic assessment, nor did they relate to specified functional standards. Present levels of performance typically discussed at length vocational life skills, but gave little or no information regarding academic basic skills. In looking at student goals, however, the team found academically based goals. These goals were unrelated to the student’s present levels. The team also found inappropriate short-term objectives or benchmarks. The objectives or benchmarks described training procedures for staff providing instruction to the student, instead of providing a breakdown of the goal into smaller, manageable learning tasks that the student needs to learn in order to master the skill.

## **Principle 6 – Least Restrictive Environment**

After the IEP is developed or reviewed, the IEP team must decide where the IEP services are to be provided. Consideration begins in the general education classroom for school age students. The specific areas addressed in principle six are placement decisions, consent for initial placement, least restrictive environment procedures, preschool children, and LRE related issues.

### **Steering Committee Conclusions**

Data sources used –

- ? Teacher file reviews
- ? Student progress data
- ? Agency placement procedures

### **Areas of maintenance**

The self-assessment concluded the cooperative provides the least restrictive environment for students placed in their facility. It was reflected as being at a level of consistent implementation.

### **Validation Results**

### **Maintenance**

Via review of IEP documentation onsite and in staff interview, the monitoring team concludes the agency consistently meets the requirements of this section.

## **BHSSC Alternative School Program Report**

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## **Principle 1 – General Supervision**

General supervision means the school district's administrative responsibilities to ensure federal and state regulations are implemented and a free appropriate public education is provided for each eligible child with a disability. The specific areas addressed in principle one are child find, referral procedures, children voluntarily enrolled by parents in private schools, students placed by the school district, improving results through performance goals and indicators (assessment, drop out, graduation), professional development, and suspension and expulsion rates.

### **Steering Committee Conclusions**

Data sources used for self-assessment –

- ? Agency procedures
- ? Agency personnel development plan

**Areas of maintenance**

The committee indicated in their self-assessment that the alternative school program is at a maintenance level for addressing improving results through performance goals and indicators and personnel and professional development.

**Areas that need improvement**

The conclusion summary of the self-assessment noted a potential need for more staff training regarding meeting the needs of students in special education.

**Not Applicable**

The self-assessment completed by the alternative school's steering committee indicated a number of areas under general supervision are not applicable to the program. These areas include child find, referral, private school students, students placed by the school district and suspension/expulsion rates.

The alternative school program receives students already identified from school districts across the state, and thus, do not have a process for child find and referral. Additionally, the alternative school does not suspend or expel students, and therefore has no information or procedures to review.

**Validation Results**

Via the review of IEP documentation onsite and in staff interview, the monitoring team concludes the agency consistently meets the requirements of this section.

<b>Principle 2 – Free Appropriate Public Education</b>
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All eligible children with disabilities are entitled to a free appropriate public education in the least restrictive environment. The specific areas addressed in principle two are the provision of FAPE to children residing in group homes, foster homes, or institutions, making FAPE available when a child reaches his/her 3<sup>rd</sup> birthday and providing FAPE to eligible children with disabilities who have been suspended or expelled from school for more than 10 cumulative days.

**Steering Committee Conclusions****Promising Practices**

The self-assessment identified the grant program between the local police department and the alternative school as a promising practice. This grant provides for a police liaison officer to be present throughout the day at the alternative school.

Additional potential promising practices included the offering of an accredited educational program, and the frequency of meetings to develop appropriate plans for students.

**Areas of maintenance**

The steering committee concluded that FAPE is met consistently in the alternative school program.

**Areas that need improvement**

The steering committee saw a need for encouraging and providing families to interact in the alternative school setting.



**Not applicable**

The alternative school does not allow for suspension or expulsion of students, therefore this requirement was determined to be not applicable.

**Validation Results****Promising practices**

The use of a police officer liaison was validated as a promising practice for the agency. The cooperative's liaison officer maintained incident report data for school years 1999-2000 and 2000-2001. This data showed a decline in verbally abusive behavior and other areas including noncompliance, being out of an assigned area, completion of coursework and running away. Student surveys reported that the overall climate of the alternative school was positively impacted by the presence of the officer. Students felt the information and interventions provided by the officer made for a safer school and reduced negative behaviors.

**Maintenance**

Via the review of IEP documentation onsite and in staff interview, the monitoring team concludes the agency consistently meets the requirements of this section.

<b>Principle 3 – Appropriate Evaluation</b>
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A comprehensive evaluation is conducted by a team of knowledgeable staff, which also includes parental input. A valid and reliable evaluation will result in effective individualized education programs for eligible students. The specific areas addressed in principle three are written notice and consent for evaluation, evaluation procedures and instruments, eligibility determination, reevaluation and continuing eligibility.

**Steering Committee Conclusions**

Data sources used:

- ? Evaluation procedures for the alternative school
- ? Review of evaluation intake forms
- ? Evaluation information from student files

**Promising Practice**

The steering committee identified the alternative schools intake process, which includes taking referrals from local school districts, to be a promising practice. Also identified, as a promising practice, was the level of communication between the alternative school and local school districts. The steering committee also noted the presence of parents in the team process and the psychologist as a team member in explaining the evaluations and their results as other potential promising practices.

**Areas of maintenance**

The self-assessment summary addressed interagency coordination that occurs prior to sending notices for meetings. The steering committee concluded that this coordination is consistently applied at a maintenance level.

**Areas that need improvement**

The self-assessment summary provided that parents are not included on the evaluation team and that more parental input into the evaluation and transition planning process was needed. Greater student involvement was also noted as an area of need for transition planning. The self-assessment also reflected

a need to improve in documentation of student's placement and the identification of their particular disability.

## **Validation Results**

### **Areas that need improvement**

#### **Prior notice/parent consent**

A review of prior notices given for meetings revealed some inconsistencies in application. Onsite, the review team found a prior notice for reevaluation which was blank, however, the parent's signature for consent was already on the document. In interview, the staff verified that they had obtained the consent while the parent was present, and did not have it completed with all the information necessary to ensure the parent was fully informed of the actions being proposed for which the school was seeking their consent. Additionally, another student file was reviewed where multiple IEP meetings were held. No prior notices could be found for three IEP addendum meetings held on 12/13/00, 1/23/01, and 9/14/01.

#### **Parental participation/input**

Parents are part of the team for evaluation planning. The school indicated in interview they contact parents by phone to seek their input. Staff were able to show informal teacher logs documenting the call, however the usefulness of the record was in doubt. By and large, the alternative school does not have a system in place to seek the input of the parent and record that input to ensure its use in the evaluation determination process.

#### **Functional evaluation**

The alternative school has students moving in and out of programs with a great amount of regularity. The school has the responsibility for performing three-year reevaluations, however, many students do not have this requirement occur during their time in the alternative school. For those students who do present themselves during the time for a triennial reevaluation, the review team noted a lack of functional assessment for the purposes of program planning.

## **Principle 4 – Procedural Safeguards**

Parents of children with disabilities have certain rights available. The school makes parents aware of these rights and makes sure they are understood. The specific areas addressed in principle four are adult student/transfer of rights, content of rights, consent, written notice, confidentiality and access to records, independent educational evaluation (IEE), complaint procedures, and due process hearings.

## **Steering Committee Conclusions**

### **Promising practices**

The steering committee addressed the BHSSC sexual harassment handbook as a potential promising practice. The alternative school provides intensive orientation and training to both faculty and students on this topic. The police liaison officer was also again identified in the self-assessment as a potential promising practice.

### **Areas of maintenance**

The self-assessment conclusion summary noted that parental rights are given at each meeting and families are given information regarding the state advocacy organization. The assessment also noted that family involvement was encouraged past the age of majority.

## **Validation Results**

### **Areas out of compliance**

#### **ARSD 24:05:30:15 Surrogate Parents**

File documentation was reviewed for a student under the care and custody of the state. Staff indicated that parent's rights were unknown, however, a Department of Social Services employee signed consent for the student. The alternative school staff indicated they do not have a process in place for the appointment of surrogate parents, nor do they maintain a list of surrogate parents.

#### **24:05:29:07 List of types and locations of information**

During a review of five student files, the team was not able to locate any information regarding a list of types and locations of educational records collected and maintained. In interview with the alternative school staff, they verified that the program does not have or maintain a list of the types and locations of educational records collected, maintained and used.

## **Principle 5 – Individualized Education Program**

The Individualized Education Program (IEP) is a written document for a child with a disability that is developed, reviewed and revised by the IEP team, which includes the parent. The specific areas addressed in principle five are IEP team, IEP content, transition components for secondary IEPs, annual reviews, transition from early intervention program, and IEP related issues.

### **Steering Committee Conclusions**

Data sources used:

- ? Student file reviews of IEPs
- ? Documentation of outside agency contacts
- ? Evaluation reports

### **Areas of maintenance**

The self-assessment conclusion summary indicated they consistently contact outside agencies for accessing services. The alternative school staff indicated they make contact with Project Skills, Vocational Rehabilitation, ROTC, Armed Services and Job Corps.

### **Areas that need improvement**

Areas identified in the self-assessment summary included identification of previous evaluation information needed to address transition issues. There was also a need to perform functional evaluations and adaptive behavior evaluations for all students. Transition services need to be more specific to each student and their needs, including documentation of all activities in which students are involved. Progress reporting to parent was also an area for improvement.

### **Areas possibly out of compliance**

Present levels of performance in student IEPs were noted as not being clearly identified, via the self-assessment process.

## **Validation Results**

### **Areas out of compliance**

24:05:27:01.02 Development, review and revision of individualized education program

24:05:27:01.03 Content of individualized education program.

The alternative school works with district-developed IEPs and also develops an IEP in-house for students who are present in the program at the time of their annual review. For the purposes of compliance with this section, the review team validated the conclusions of the self-assessment regarding IEPs developed by alternative school staff. In all, five student IEPs were reviewed in-depth. As a result of the review, the team was able to validate the concerns for present levels of performance. A review of student IEPs indicated the present levels did not describe how the student's disability affects their involvement and progress in the general curriculum. This concern was carried forward in the annual goals. IEP goals were broad, and again, not linked to the student's involvement and progress in the general curriculum. An example of a broad goal is "will improve in basic math."

Another concern noted by the review team is the process of consideration by the IEP team when a student's behavior impedes his or her learning or that of others. The majority of the students placed at the alternative school are there specifically to address behavioral concerns. Student IEPs did not address the strategies to be employed in addressing those concerns, including positive behavioral interventions, strategies and supports. What was seen were generic statements regarding "serious behavior" or "difficulty in social situations," but no plans for intervention. Accompanying this concern, the review team found several student plans calling for counseling as a related service. In some cases, specific annual goals or short term objectives were missing from the IEP supporting the focus and educational objective of the related service. In other situations, the amount of the related service was not specified. For example, the IEP would list counseling as a related service to be provided "1 time per week", but no amount was given. As an additional point to this concern, the alternative school staff related their concerns and difficulty in specifying the amount of special education services to students when developing the IEP.

## **Principle 6 – Least Restrictive Environment**

After the IEP is developed or reviewed, the IEP team must decide where the IEP services are to be provided. Consideration begins in the general education classroom for school age students. The specific areas addressed in principle six are placement decisions, consent for initial placement, least restrictive environment procedures, preschool children, and LRE related issues.

### **Steering Committee Conclusions**

Data sources used:

- ? Placement data
- ? Graduation rate information
- ? Staff/student ratios

### **Promising practices**

A variety of potential promising practices were identified under this section. The steering committee recognized that students attending the alternative school program have the opportunity to graduate through their local schools via interdistrict agreements for acceptance of credits. The students work on an accredited curriculum, meeting similar requirements as students in traditional secondary school settings. The school provides a high staff to student ratio, allowing faculty to adjust to a variety of modality

strengths. Finally, the self-assessment noted that employability opportunities for students are addressed, along with transportation needs.

#### **Areas of maintenance**

The involvement of the resident district, parents, and students, outside agencies and alternative school staff was noted as a consistently met requirement in the development of student placements. The steering committee noted in the self-assessment that reintegration always leads the process, seeking to return the student to their local school district when success is a high probability.

#### **Area in need of improvement**

The steering committee generated a number of questions regarding their potential need for improvement under this section. Overall, the committee voiced a concern with the alternative school's process for how services are determined and identified via the placement committee. It was noted that due to the rapid movement of students in and out of the school, it was difficult to ascertain if a process was being implemented consistently to ensure students were placed in the least restrictive environment, following all required procedures.

### **Validation Results**

#### **Promising practices**

The cooperative alternative school received a School to Work grant to fund a music recording studio onsite at the school. This recording studio is available to all students and serves as a reinforcer for appropriate behavior and reward for consistent good work. Students are able to burn compact discs with their own music, as well as take music lessons. Staff reported the effectiveness of the facility in encouraging students to improve and develop new skills addressing their creativity and artistic interests.

#### **Area in need of improvement**

Onsite, the review team discussed with alternative school staff the process for determining least restrictive environment. Staff reported a concern regarding their process of receiving students into the program, and how to document the decision making process. In looking at IEP team determinations for placement, the statements are not reflective of student-based needs, but rather just a program description. There is no discussion or documentation regarding how the team arrived at the decision of placement.